it is no doubt owing to the prevalence of this usage and to the habits of thought resulting therefrom that there is such a dearth of judicial decisions upon the question of the principal case. But while the accused has the right to a public trial, the court has the power in proper cases to put a reasonable limit to the number of persons that may be admitted to the courtroom and to exclude those whose presence and conduct tend to interfere with the due and orderly progress of the trial. *People* v. *Swafford*, 65 Cal. 223, 3 Pac. 809; *State* v. *Brooks*, 92 Mo. 542, 5 S. W. 257. See COOLEY, CONSTITUTIONAL LIMITATIONS, 6 ed., 379. And the right of a court to try a case with closed doors has been recognized in a limited class of cases; dealing with lunacy, wards of the court, and secret processes. *Ogle* v. *Brandling*, 2 Russ. & M. 688; *Mellor* v. *Thompson*, 31 Ch. D. 55. But this power has been strictly limited to cases where it would not be possible to administer justice in open court. See *Scott* v. *Scott*, [1913] A. C. 417, 445; 27 HARV. L. REV. 88. In the United States the constitutional provision for a speedy and public trial has been very strictly enforced. *People* v. *Murray*, 89 Mich. 276, 50 N. W. 995; *People* v. *Hartman*, 103 Cal. 242, 37 Pac. 153. The principal case seems to fall clearly within the exception as laid down in *Scott* v. *Scott*, since a public hearing would have endangered the administration of justice, and the English rules of courts martial expressly provide that trials may be held with closed doors. MANUAL FOR COURTS MARTIAL FOR 1917, § 92.

WILLS — CONSTRUCTION — GIFT TO A CLASS ON A CONTINGENCY: CONTINGENCY NOT IMPORTED INTO DETERMINATION OF THE CLASS. — A will bequeathed a fund to the testator's daughter for life, with the provision that upon her death "leaving issue her surviving" her share should be divided between "the issue" of the said daughter on their severally attaining their respective ages of twenty-one. There was a gift over if the daughter died without leaving issue surviving her. The daughter died, predeceased by children who had attained twenty-one, and survived by others who also attained twenty-one. The question was whether the representatives of the deceased children took. *Held*, that they did. *In re Walker, Dunkerly* v. *Hewerdine*, [1917] 1 Ch. 38.

As a general rule of the construction of wills, if there is a gift to a class on a contingency, the time of the happening of the contingency is not imported into the determination of the class. *Hickling* v. *Fair*, [1899] A. C. 15. See THEOBALD, WILLS, 7 ed., 593; 2 JARMAN, WILLS, 6 ed., 1390. So, if a gift is made to children who reach twenty-one on the contingency that the parent die leaving issue her surviving, and the contingency occurs, all of the children who reach twenty-one at any time will take, and not those only who survived. *Boulton* v. *Beard*, 3 D. M. & G. 608. The suggestion has been made that the rule is inapplicable where there was a gift over on failure of the contingency. See THEOBALD, WILLS, 7 ed., 593. Thus, where in the above case it is further provided that, if the parent die leaving no issue surviving, there will be a gift over, and the parent dies leaving issue, only those children who survive would take. See *Wilson* v. *Mount*, 19 Beav. 292. No reason appears for such a limitation on the rule: the gift over merely provides against a possible intestacy. So the principal case seems right in holding that here, too, all the children who fall within the primary meaning of the words describing the class shall take, and not only those who survive. *In re Orlebar's Settlement Trusts*, L. R. 20 Eq. 711. The principal interest in the case lies in the good illustration which it affords of the ease with which the fixed English rules of general application solve difficult questions of construction in wills in which the testator expressed no intention with regard to the precise event which actually happened. For a full treatment of this matter, see 30 HARV. L. REV. 372.